

UNITED STATES OF AMERICA  
BEFORE THE NATIONAL LABOR RELATIONS  
BOARD REGION 9

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ALLSOURCE GLOBAL MANAGEMENT, LLC

and

Case No. 09-CA-150053

JOHN L. PRICE, an individual

and

Case No. 09-CA-153425

TRESA BRIDGES, an individual

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**ALLSOURCE GLOBAL MANAGEMENT, LLC'S  
MOTION TO POSTPONE HEARING**

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Pursuant to 29 C.F.R. § 102.16(a), AllSource Global Management, LLC and AllSource Global Management (collectively “AGM”) by its attorneys, Quarles & Brady LLP, submits the following Motion to Postpone the Hearing in the above-referenced matter, currently scheduled to begin at 1:00 p.m. on March 14, 2016. In support of this motion, AGM states as follows:

1. Counsel for AGM, Fred Gants and Kerry M. Mohan, are scheduled to attend the 2016 American Bar Association Occupational Safety and Health Law midwinter meeting from March 8 - 11, 2016 in Santa Barbara, California. Mr. Gants and Mr. Mohan have already reserved rooms for the conference and will be limited in their ability to prepare for the March 14, 2016 hearing as a result.

2. Moreover, in March of 2016, AGM will assist in taking occupancy of a newly-constructed warehouse building at the Lexington, Kentucky facility. The new building is a massive undertaking, as it is expected to be in excess of 200,000 square feet in size. The new building is expected to be finished near the end of March 2016, and

planning for the upcoming move has already started. In preparation for the building's completion, AGM has been, and continues to be, required to expend significant resources and time to prepare the moving of approximately 13,000 pallets of material from the existing buildings to the new building. This process will be a major disruption to AGM's mission to provide support to the United States Government's special operations forces throughout the world. Further, Perla Romo, HR and Program Manager, and Jonathan Groth, Program Manager, two of AGM's key witnesses, will be required to implement and oversee additional shifts, to include evening and weekend support, and will have extremely limited time to assist AGM in preparing for trial or to attend trial. At this time, Ms. Romo and Mr. Groth are exclusively responsible for managing the Lexington site, and AGM does not have any type of "replacements" that would be able to fill in while either are out of the office.

3. Further, once the new building is complete, AGM will be required to expend significant resources and time from March 2016 through September 2016 to move materials from its existing buildings to the new building, which will involve increased hiring and shifts, and impact AGM's mission to support the United States Government's special operation forces throughout the world. Further, during this time period, Ms. Romo and Mr. Groth will have extremely limited time to assist AGM in preparing for trial or to attend trial, as they will be required to work on differing shifts. AGM believes that operations will return to normal in the end of May 2016.

4. In addition, Mr. Gants has a previously scheduled family vacation out of the country from March 31, 2016 to April 12, 2016.

5. Mr. Gants and Mr. Mohan are also scheduled to be in several hearings from March to May 2016. On March 28 to 30, 2016, Mr. Mohan is scheduled to be in an arbitration in Mississippi. On May 5 to 6, 2016, Mr. Gants is scheduled to be in a hearing in Madison, Wisconsin.

6. Consequently, AGM requests that the hearing be postponed to June 2016, and preferably the week of June 20 to 24, 2016.

7. On February 9, 2016, Mr. Gants conferred with Daniel Goode, trial counsel for Region 9, regarding the aforementioned scheduling conflicts and other alternative dates for the trial. Based on the discussions, Mr. Goode stated that he takes no position regarding AGM's motion.

8. On February 9, 2016, Mr. Mohan conferred with charging party John L. Price, who opposed AGM's motion.

9. On February 9, 2016, Mr. Mohan conferred with charging party Tresa Bridges regarding AGM's desire to postpone the hearing to June of 2016. Ms. Bridges stated that she wished to consult with Mr. Goode, trial counsel for Region 9, before providing a response. As of the time of this filing, Ms. Bridges had not provided a response.

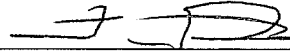
10. Based on the dates currently available for AGM's counsel, counsel for Region 9, Mr. Goode, and all anticipated witnesses in this case, AGM proposes as alternative dates for the trial June 20 through 24, 2016.

11. AGM's Motion to Postpone Hearing should be granted, as there will be no harm in postponing the matter, as the case does not involve employee termination(s) and the Board does not seek reinstatement of any individuals.

WHEREFORE, Respondent AGM respectfully requests that the Regional Director cancel the March 14, 2016 trial date and reschedule it to June 20 through 24, 2016, or at such alternative dates as may be mutually agreed upon by the parties.

Dated this 10<sup>th</sup> day of February, 2016.

QUARLES & BRADY LLP



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**CERTIFICATE OF SERVICE**

The undersigned, an attorney, hereby certifies that on the 10<sup>th</sup> day of February, 2016, a copy of the foregoing Allsource Global Management, LLC's Motion to Postpone Hearing was filed electronically using the National Labor Relation Board's electronic filing system. Parties may access this filing through the Agency's system.

The undersigned also represents that he caused a true and correct copy of the foregoing document to be served via UPS Next Day Air upon:

Mr. John L. Price  
121 W Linden Street  
Wilmore, KY 40390-  
1208

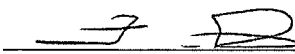
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